

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

CO-LEAD CLASS COUNSEL'S MOTION TO COMPEL
(1) CASE STRATEGIES GROUP (F/K/A NFL CASE CONSULTING, LLC),
IT STRATEGIES GROUP, INC., CRAIG SIENEMA, AND JAMES MCCABE; AND
(2) LIBERTY SETTLEMENT SOLUTIONS, LLC,
LIBERTY CONTINGENT RECEIVABLES, LLC, LIBERTY SETTLEMENT FUNDING,
JMMHCS HOLDINGS, LLC, MARC HERMES,
CRAIG SIENEMA, AND JAMES MCCABE
TO RESPOND TO THE DISCOVERY REQUESTS PROPOUNDED
IN ACCORDANCE WITH THE COURT'S ORDER OF JULY 19, 2017

Co-Lead Class Counsel submit this Motion seeking an Order compelling Case Strategies Group (formerly known as NFL Case Consulting, LLP), IT Strategies Group, Inc., Craig Sienema and James McCabe ("CSG Entities") and Liberty Settlement Solutions, LLC, Liberty Contingent

Recievables, LLC, Liberty Settlement Funding, JMMHCS Holdings, LLC, Marc Hermes, Craig Sienema and James McCabe (“Liberty Entities”), to respond fully and completely to the Requests for Production of Documents and Interrogatories propounded upon the CSG Entities and the Liberty Entities by Co-Lead Class Counsel, on July 26, 2017, consistent with the Notice & Order issued by this Court on July 19, 2017. Pursuant to the MDL statute, 28 U.S.C. § 1407, Fed. R. Civ. P. 23(d) and the All Writs Act, 28 U.S.C. § 1651, and for the reasons stated in the accompanying Memorandum of Law, the Motion should be granted and the CSG and Liberty entities should be ordered to provide full and complete responses to the discovery requests within five (5) days.

Dated: August 24, 2017

Respectfully submitted,

/s/ Christopher A. Seeger
Christopher A. Seeger
SEEGER WEISS LLP
77 Water Street
New York, NY 10005
Phone: (212) 584-0700
Fax: (212) 584-0799
cseeger@seegerweiss.com

Co-Lead Class Counsel

Sol Weiss
ANAPOL WEISS
One Logan Square
130 N. 18th St. Ste. 1600
Philadelphia, PA 19103
Phone: (215) 735-1130
Fax: (215) 735-2024
sweiss@anapolweiss.com

Co-Lead Class Counsel

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing motion, along with the supporting documents, was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter.

Dated: August 24, 2017

/s/ Christopher A. Seeger
Christopher A. Seeger